Fall 2024 Guidance and Standards Summary of Policy Changes

FEMA has guidance and standards to support the Risk Mapping, Assessment and Planning (Risk MAP) program. These standards and guidance define the implementation details of the statutory and regulatory requirements for National Flood Insurance Program (NFIP) mapping. They describe how FEMA performs Flood Risk Projects, Letters of Map Change (LOMC), and related coordination activities. They are intended for mapping professionals and Cooperating Technical Partners (CTPs) under the Risk MAP Program. See the FEMA website for more information.

FEMA has a maintenance plan for these guidelines and standards and issues updates annually. This summary relates to the 2024 update. If you, or those in your organization, want to receive updates like this, please follow this link: Signup for FEMA Email Updates (govdelivery.com)

The summary of planned changes for this cycle was published on July 29, 2024 and can be found here. Those changes are:

Simple Change Topics

Topic	Description
Floodway	There has been ongoing work for a few years to refine the program approach to mapping floodways based on 2D models. In addition, Floodplain Management has requested some significant updates to the current guidance. While this update is unlikely to address all outstanding issues with floodways, this update will address the requested changes from Floodplain Management and incorporate progress made refining the floodway mapping approach.
Discovery and Project Planning	The current Discovery guidance was oriented towards a Risk MAP lifecycle that begins before any significant hazard analysis is performed. With the shift to Base Level Engineering (BLE), the overall approach to Discovery is changing and that will continue as the Future of Flood Risk Data (FFRD) is implemented, These updates align current guidance to these evolving approaches.
New Watershed Modeling Procedure	Working with the U.S. Army Corps of Engineers (USACE), FEMA has been developing updated modeling practices that will support the technical vision of comprehensive, probabilistic watershed models developed through the Future of Flood Risk Data (FFRD) initiative. FEMA and USACE created a draft of the procedures last year and have been refining them through several pilot watersheds. This update will convert these new procedures into FEMA guidance. This work is not expected to be completed until 2025, however development of the procedure began in 2024 due to the scope of the change. The development of draft guidance will proceed in parallel to the development and testing of the procedures with USACE.

FEMA

The standard changes are as follows:

Item #	Doc. Type	SID	Standard Change Description
1	Standard	26	Rescinded as the Discovery report is no longer required and often not ordered as part of a Risk MAP project.
2	Standard	82	Updated to align to current submission requirements and definition of a Technical Support Data Notebook (TSDN).
3	Standard	91	Updated to support the combination of two existing standards (SIDs 91 and 98) to define the V-Zone for all coastal Flood Risk Projects, regardless of the flooding source.
4	Standard	109	Updated stream channel delineation requirements to include profile baselines, where available.
5	Standard	113	Reworded to simplify application of the standard and encourage use of the highest risk class.
6	Standard	133	Clarified language for where floodplain boundaries are delineated.
7	Standard	134	Corrected spelling of “redelineation” for consistency with guidance.
8	Standard	195	Included electronic Letter Of Map Ammendment (eLOMA) and online LOMC as preferred options for submitting LOMC application packages.
9	Standard	197	Minor correction to use bullet for the first item in the list.
10	Standard	199	Included reference to SID 627 for USGS quality requirements for lidar when used for defining lowest adjacent grade (LAG) or lowest lot elevation (LLE) for LOMAs.
11	Standard	215	Updated to clarify that certified elevation information is required for Conditional LOMCs. Reworded documentation requirements for demonstrating Endangered Species Act (ESA) compliance for improved clarity.

Item #	Doc. Type	SID	Standard Change Description
12	Standard	218, 404, 407	Reworded for improved clarity.
13	Standard	219	Updated language to reference both determinations and comments. Included the community map repository in the list of entities to which the determinations/comments are issued.
14	Standard	220	Rescinded since guidance references applicable regulations.
15	Standard	226	Clarified language for when standard is applicable.
16	Standard	306	Clarified floodplain mismatch resolution requirements to include extents and water surface elevations.
17	Standard	316	Removed the contained in structure notes from Flood Insurance Rate Map (FIRM) panels but requiring them on flood profiles.
18	Standard	405	Updated to align to current practices.
19	Standard	406	Updated to align to current practices.
20	Standard	408	Updated to clarify relevant details for LODRs.
21	Standard	417	Updated to make the Percent Annual Chance and Percent 30-year chance grids optional.
22	Standard	524	Updated for improved clarity.
23	Standard	525	Updated to reflect new terminology on the revalidation templates.
24	Standard	553	Revised to clarify LOMC categorization requirements.
25	Standard	602	Clarified to emphasize that levee information in the National Levee Database must be used and compared to the effective FEMA data for studies with levee systems.

Item #	Doc. Type	SID	Standard Change Description
26	Standard	612	Minor updates for consistency with G&S style guide.
27	Standard	613	Updated language to reference MT-1s instead of Conditional Letter Of Map Ammendment (CLOMA)/LOMA and removed the term “determinations” since not issued for CLOMAs.
28	Standard	614	Updated language to reference MT-1 requests instead of (C)LOMA/(C)LOMR-F determinations and reworded for improved clarity.
29	Standard	619	Updated to clarify that a PFD delineation cannot be superseded by a wave hazard analysis or structure certification and the location of the PFD is independent of hazards related to surge and waves.
30	Standard	624	Updated to clarify requirement for certified topographic data.
31	Standard	649 (New)	New standard to clarify that MT-1s are not issued where flood hazards are shown on a FIRM and designated as "For Informational Purposes Only."

Standards

The table below lists new standards and edits to existing standards made during the 2024 annual update to the Policy for Flood Risk Analysis and Mapping.

The updates are listed in the table below, with their Standard Identification Number (SID #), implementation date, primary key word(s) and current version of the standard (if applicable). The approach for implementing these standards was chosen to avoid any cost impacts on work underway.

The current standards and a list of acronyms are available on the FEMA website.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
26	Effective immediately	Discovery	A Discovery Report must include a section listing the data and information collected, when they were received, data sources, and an analysis of the data and information. It must also include the outcomes and decisions made at the Discovery Meeting.	Rescinded.
82	Effective immediately	Project Management	Final invoices shall not be paid until a TSDN is submitted, and certification is provided that contract or grant requirements are met.	Final invoices shall not be paid until summary documentation (TSDN, Project Narrative, etc.) is submitted, and certification is provided that contract or grant requirements are met.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
91	Effective immediately	Coastal - Mapping	For coastal Flood Risk Projects, VE Zones are identified using one or more of the following criteria for the 1-percent flood conditions: 1. The breaking wave height zone occurs where 3-foot or greater wave heights could occur (this is the area where the wave crest profile is 2.1 feet or more above the static water elevation) (REQUIRED) 2. The primary frontal dune zone, as defined in 44 C.F.R. § 59.1 of the NFIP regulations (REQUIRED) 3. The wave runup zone occurs where the (eroded) ground profile is 3.0 feet or more below the Total Water Level, and 3.0 feet of wave runup height occurs in the analysis along the profile (REQUIRED) 4. The wave overtopping splash zone is the area landward of the crest of an overtopped barrier, in cases where the potential wave runup exceeds the barrier crest elevation by 3.0 feet or more and exceeds 1.0 cfs/ft (REQUIRED) 5. The high-velocity flow zone is landward of the overtopping splash zone (or area on a sloping beach or other shore type), where the product of depth of flow times the flood velocity squared is greater than or equal to 200 ft3/sec2 (OPTIONAL)	For coastal Flood Risk Projects, VE Zones are identified using one or more of the following criteria for the 1% annual-chance flood conditions: 1. The breaking wave height zone occurs where 3-foot or greater wave heights could occur (this is the area where the wave crest profile is 2.1 feet or more above the static water elevation) (REQUIRED) 2. The primary frontal dune zone, as defined in 44 C.F.R. § 59.1 of the NFIP regulations is based on the geometry of the regional feature and is independent of surge and wave driven coastal hazards (REQUIRED) 3. The wave runup zone occurs where the (eroded) ground profile is 3.0 feet or more below the Total Water Level, and 3.0 feet of wave runup height occurs in the analysis along the profile (REQUIRED) 4. The wave overtopping splash zone is the area landward of the crest of an overtopped barrier, in cases where the potential wave runup exceeds the barrier crest elevation by 3.0 feet or more and exceeds 1.0 cfs/ft (REQUIRED) 5. The high-velocity flow zone is landward of the overtopping splash zone (or area on a sloping beach or other shore type), where the product of depth of flow times the flood velocity squared is greater than or equal to 200 ft3/sec2 (OPTIONAL)

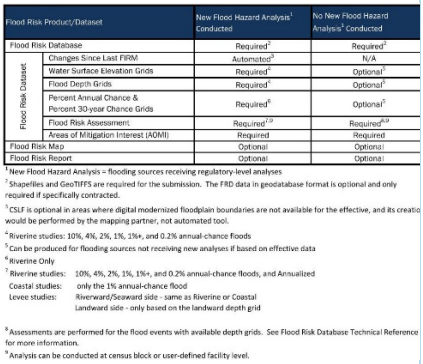
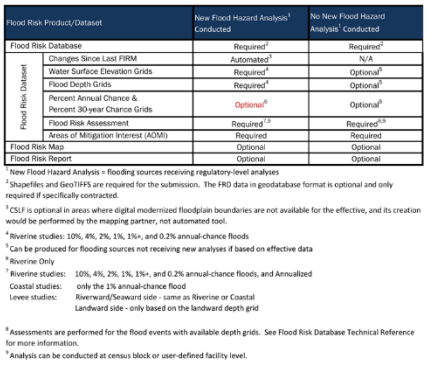
SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
109	Effective immediately	Floodplain Boundaries	Stream channel boundaries or centerlines must be shown within the identified 1-percent-annual-chance floodplain; if a regulatory floodway is developed, the stream must be shown within the regulatory floodway boundaries.	Stream channel boundaries or centerlines and Profile Baselines for new studies must be shown within the identified 1-percent-annual-chance floodplain; if a regulatory floodway is developed, the stream, or Profile Baseline, where available, must be shown within the regulatory floodway boundaries.
113	Effective immediately	FBS	The flood risk class must be determined for each flooding source to identify what Floodplain Boundary Standard flood risk class must be met and what level of analysis is required. (Refer to Figure 2 in Appendix C).	If a singular risk class is used for all flooding sources to comply with the Floodplain Boundary Standard (FBS), then all flooding sources must meet the highest flood risk class (A) when evaluating FBS delineation reliability requirements (Refer to Figure 2 in Appendix C). Alternatively, the flood risk class may be determined for each flooding source to identify what FBS flood risk class must be met and what level of analysis is required.
133	Effective immediately	Floodplain Boundaries	Floodplain boundaries of the 1-percent-annual-chance flood must be delineated. If it is calculated, the 0.2-percent-annual-chance flood must be delineated.	Floodplain boundaries of the 1-percent-annual-chance flood must be delineated on the FIRM. If it is calculated, the 0.2-percent-annual-chance flood must be delineated on the FIRM.
134	Effective immediately	Redelineation	If the re-delineation topographic data indicates that the effective hydraulic analyses are no longer valid, further actions must be coordinated with the FEMA Project Officer and the (Community Needs Management Strategy) CNMS database must be updated.	If the redelineation topographic data indicates that the effective hydraulic analyses are no longer valid, further actions must be coordinated with the FEMA Project Officer and the CNMS database must be updated.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
195	Effective immediately	Letter of Map Change (LOMC)	LOMC requestors shall submit requests, including the required review and processing fee if applicable, to the appropriate processing address. The address is provided in the application forms package that must be used in preparing a LOMC request for submittal.	LOMC requesters shall send requests and required review and processing fees, if applicable, through the eLOMA or online LOMC tools. Alternatively, requests can be sent by mail to the address in the LOMC application package.
197	Effective immediately	Letter of Map Change (LOMC)	Upon receipt of a LOMC, the following shall be done: Make an initial determination as to the expected processing procedure • Assign a case number • Create a case file • Enter the request into the MIP • Record the date of receipt	Upon receipt of a LOMC, the following shall be done: • Make an initial determination as to the expected processing procedure • Assign a case number • Create a case file • Enter the request into the MIP • Record the date of receipt
199	Effective immediately	Letter of Map Change (LOMC)	LOMC submittals must include certifications by a licensed professional authorized to certify the data under state law, except when lidar is provided to satisfy the lowest adjacent grade (LAG) requirements for LOMAs.	LOMC submittals must include certifications by a licensed professional authorized to certify the data under state law. For LOMAs, lidar can be used to define the lowest adjacent grade (LAG) or lowest lot elevation (LLE) as specified in SID 627.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
215	Effective immediately	Letter of Map Change (LOMC)	Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except: • Because Conditional LOMCs are based on proposed construction, as-built information is not required. • The Conditional Comment Documents that are issued by FEMA do not amend or revise the effective FHBM or FIRM. • Conditional LOMRs and CLOMR-Fs must demonstrate compliance with the Endangered Species Act.	Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except: • Because Conditional LOMCs are based on proposed construction, as-built information is not required; however, proposed certified elevation information is required. • The Conditional Comment Documents that are issued by FEMA do not amend or revise the effective FHBM or FIRM. • Conditional LOMRs and CLOMR-Fs must provide documentation to FEMA to demonstrate compliance with the Endangered Species Act.
218	Effective immediately	Letter of Map Change (LOMC)	LOMA, CLOMA, LOMR-F, CLOMR-F, LOMR and CLOMR determinations must be issued based on the effective FIRM and FIS for a community and may not be issued based on preliminary data for a FEMA-contracted Flood Risk Project or community-initiated map revision. However, if the effective Special Flood Hazard Area (SFHA) does not have BFEs or flood depths established and the preliminary data is the best available, a one-percent-annual chance flood hazard water surface elevation may be calculated during LOMA, CLOMA, LOMR-F, or CLOMR-F reviews using data from these sources.	LOMC (LOMA, CLOMA, LOMR-F, CLOMR-F, LOMR and CLOMR) determinations must be issued based on the effective FIRM and FIS. If effective BFEs or flood depths are not available, the reviewer can use preliminary data from FEMA-contracted Flood Risk Projects or community-initiated map revisions if it is the best available to define the base flood (1-percent-annual-chance) elevation.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
219	Effective immediately	Letter of Map Change (LOMC)	Following the preparation of the LOMC determination document, the LOMC shall be included in the list of determinations that is to be sent to FEMA for official approval. Following approval, the requester shall be provided with FEMA's final determination. A copy of the LOMC determination document shall also be sent to the community CEO and floodplain administrator and to the requester when applicable.	All LOMC determinations/comments will be sent to FEMA for official approval. Upon FEMA approval the determinations/comments will be issued to the community CEO/requester and floodplain administrator/manager, including the community map repository.
220	Effective immediately	Letter of Map Change (LOMC)	The reviews of LOMC requests shall be processed in accordance with the Code of Federal Regulations Title 44 C.F.R. Parts 65, 67, 70, and 72.	Rescinded.
226	Effective immediately	Letter of Map Change (LOMC)	LOMC requests involving below-grade crawlspaces constructed within the SFHA shall follow guidance provided in FEMA Technical Bulletin 11.	MT-1 requests with below-grade crawlspaces constructed within the SFHA shall follow guidance in FEMA Technical Bulletin 11.
306	Effective immediately	Floodplain Boundaries	Any existing mismatches in floodplains and flood hazard information between communities and counties must be resolved as part of a FIS Report/FIRM update.	Any existing mismatches in floodplain extents and water surface elevation information between communities and counties must be resolved as part of a FIS Report/FIRM update.
316	Effective for projects not yet in QR1	FIRM Graphics Standards	Hydraulic structures other than levees shall be labeled on the FIRM panel only if shown on the Flood Profile of the FIS Report. The label name must match what is shown on the Flood Profile. If 1-percent-annual-chance, 0.2-percent-annual-chance-flood discharge, and/or floodway are contained in the structure, a note must be placed on the FIRM panel near the feature to refer to the highest contained discharge.	Hydraulic structures other than levees must be labeled on the FIRM panel and match what is shown on the flood profile. If the 1-percent-annual-chance flood discharge, 0.2-percent-annual-chance flood discharge, and/or floodway are contained in the structure, the applicable note shall only be labeled on the flood profile and refer to the highest contained discharge.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
404	Effective immediately	Letter of Map Change (LOMC)	The Compendium of Flood Map Changes shall be published every six months (180 days). Publication shall occur within 15 days of the close of the 6-month reporting period.	The Compendium of Flood Map Changes (LOMCs) shall be published every six months (180 days). Publication shall occur within 15 days of the close of the 6-month cycle.
405	Effective for projects whose revalidation letters have not yet been submitted.	Revalidation	Four weeks before the effective date of the revised map, the revalidation package shall be submitted to FEMA for review and approval using the standardized checklist, located at the Flood Risk Templates and Other Resources page on the FEMA website, prior to issuing the revalidation letters.	Forty-five days before the effective date of the revised map, the revalidation package shall be submitted to FEMA for review and approval using the standardized checklist, located at the Flood Risk Templates and Other Resources page on the FEMA website, prior to issuing the revalidation letters.
406	Effective immediately	Revalidation	The LOMC-VALID letter shall be provided to the community CEO and floodplain administrator and the LOMC Subscription Service Coordinator within five business days of the effective date of the revised FIRM(s).	The LOMC-VALID letter shall be mailed to the community CEO and floodplain administrator and the Distribute Revalidation MIP Task submitted no less than five business days prior to the effective date of the revised FIRM(s).
407	Effective immediately	Letter of Map Change (LOMC)	FEMA will make available the following at regular intervals: • final LOMCs with attachments • final SOMAs • revalidation letters.	FEMA will make available the following at regular intervals: • Final LOMCs with attachments, as applicable • Final SOMAs • Revalidation letters
408	Effective immediately	Letter of Map Change (LOMC)	Requests for Letters of Determination Review (LODRs) shall be processed.	Requests for Letters of Determination Reviews (LODRs) can be submitted to FEMA by a lender or borrower within 45 days of notification that the structure is located in a SFHA by the lender. The LODR request must be signed by both lender and borrower.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
417	Effective immediately	Flood Risk Datasets	The minimum datasets associated with the Flood Risk Project are defined as follows:  [1] New Flood Hazard Analysis = flooding sources receiving regulatory-level analyses [2] Shapefiles and GeoTIFFS are required for the submission. The FRD data in geodatabase format is optional and only required if specifically contracted. [3] CSLF is optional in areas where digital modernized floodplain boundaries are not available for the effective, and its creatio would be performed by the mapping partner, not automated tool. [4] Riverine studies: 10%, 4%, 2%, 1%, 1%+, and 0.2% annual-chance floods [5] Can be produced for flooding sources not receiving new analyses if based on effective data [6] Riverine Only [7] Riverine studies: 10%, 4%, 2%, 1%, 1%+, and 0.2% annual-chance floods, and Annualized Coastal studies: only the 1% annual-chance flood Levee studies: Riverward/Seaward side - same as Riverine or Coastal Landward side - only based on the landward depth grid [8] Assessments are performed for the flood events with available depth grids. See Flood Risk Database Technical Reference for more information. [9] Analysis can be conducted at census block or user-defined facility level.	The minimum datasets associated with the Flood Risk Project are defined as follows:  [1] New Flood Hazard Analysis = flooding sources receiving regulatory-level analyses [2] Shapefiles and GeoTIFFS are required for the submission. The FRD data in geodatabase format is optional and only required if specifically contracted. [3] CSLF is optional in areas where digital modernized floodplain boundaries are not available for the effective, and its creation would be performed by the mapping partner, not automated tool. [4] Riverine studies: 10%, 4%, 2%, 1%, 1%+, and 0.2% annual-chance floods [5] Can be produced for flooding sources not receiving new analyses if based on effective data [6] Riverine Only [7] Riverine studies: 10%, 4%, 2%, 1%, 1%+, and 0.2% annual-chance floods, and Annualized Coastal studies: only the 1% annual-chance flood Levee studies: Riverward/Seaward side - same as Riverine or Coastal Landward side - only based on the landward depth grid [8] Assessments are performed for the flood events with available depth grids. See Flood Risk Database Technical Reference for more information. [9] Analysis can be conducted at census block or user-defined facility level. *See below for larger table graphic comparison
524	Effective immediately	SOMA	When multiple determination LOMAs and LOMR-Fs include both removal and non-removal determinations, and all determinations remain the same based on the new or revised mapping, the case must be included in Category 2A or Category 2B in the MIP SOMA Workbench.	When multiple determination LOMAs and LOMR-Fs include both removal and non-removal determinations, and all determinations included in the original LOMC remain the same based on the new or revised mapping, the case must be included in Category 2A or Category 2B in the MIP SOMA Workbench.
525	Effective immediately	SOMA	On the Preliminary and Final SOMA, the map number and map suffix must be listed in the Original Panel field and Current Panel field for each valid LOMC. On the Revalidation Letter, the FIRM Panel Number and map suffix must be listed for each valid LOMC.	On the Preliminary and Final SOMA, the map number and map suffix must be listed in the Current LOMC Panel Number field and New LOMC Panel Number field for each valid LOMC. On the Revalidation Letter, the FIRM Panel Number and map suffix must be listed for each valid LOMC.

553	Effective immediately	SOMA	LOMCs shall be categorized on the SOMA as follows: - Category 1 (LOMCs Incorporated) - Includes those LOMRs (and some LOMAs and LOMR-Fs) whose results are unaffected by new or revised flood hazard data, and whose results can and will be incorporated into the revised FIRM panel(s). Large metes-and-bounds or multi-lot property removal LOMR-Fs are sometimes incorporated through Category 1 when scale limitations do not prohibit it; although typically, these LOMAs and LOMR-Fs will be revalidated through Category 2. Structure removal (both single and multiple determination) LOMCs cannot be incorporated due to scale limitations and therefore shall not be included in Category 1. - Category 2A (LOMCs Not incorporated on revised panels) - Includes those valid LOMCs that shall remain effective and/or are within the revised panel footprint of the study. - Category 2B (LOMCs Not incorporated on unrevised panels) – Includes those valid LOMCs within a community that shall remain effective and/or fall on unrevised panels within that community. - Category 3 (LOMCs Superseded) - Includes those LOMCs whose results will not be reflected on the revised FIRM panel because the flood hazard data on which the determinations are based are	LOMCs shall be categorized on the SOMA as follows: - Category 1 (LOMCs Incorporated) - Includes those LOMRs (and some LOMAs and LOMR-Fs) whose results are unaffected by new or revised flood hazard data, and whose results can and will be incorporated into the revised FIRM panel(s). Large metes-and-bounds or multi-lot property removal LOMR-Fs are sometimes incorporated through Category 1 when scale limitations do not prohibit it; although typically, these LOMAs and LOMR-Fs will be revalidated through Category 2. Structure removal (both single and multiple determination) LOMCs cannot be incorporated due to scale limitations and therefore shall not be included in Category 1. - Category 2A (LOMCs Not incorporated on revised panels) - Includes those valid LOMCs that shall remain effective and are within the revised panel footprint of the study. - Category 2B (LOMCs Not incorporated on unrevised panels) – Includes those valid LOMCs within a community that shall remain effective and fall on unrevised panels within that community. - Category 3 (LOMCs Superseded) - Includes those LOMCs whose results will not be reflected on the revised FIRM panel because the flood hazard data on which the determinations are based are being superseded by new

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
			being superseded by new detailed flood hazard data, or the information available was not sufficient to make a determination - Category 4 (LOMCs To Be Redetermined) - Includes those LOMAs and LOMR-Fs issued for multiple lots or structures for which new determinations must be made because the determination for one or more properties or structures has changed as a result of the new or revised flood hazard information, and therefore cannot be revalidated.	detailed flood hazard data, the information available was not sufficient to make a determination, or were superseded by another LOMC. - Category 4 (LOMCs To Be Redetermined) - Includes those LOMAs and LOMR-Fs issued for multiple lots or structures for which new determinations must be made because the determination for one or more properties or structures has changed as a result of the new or revised flood hazard information, and therefore cannot be revalidated.
602	Effective immediately	Levee	For the analysis and mapping of flood hazards associated with levee systems, data and documentation from the USACE National Levee Database (NLD) must be leveraged as a starting point. Effective FEMA data and supplemental data from local communities, tribal entities or other federal or state agencies, including terrain data, should be evaluated, and the most accurate data shall be used. FEMA shall provide USACE with updated levee data for incorporation into the NLD as appropriate.	For the analysis and mapping of flood hazards associated with levee systems, data and documentation from the USACE National Levee Database (NLD) must be leveraged as a starting point. Then, this data must be compared to effective FEMA data and supplemental data from local communities, tribal entities or other federal or state agencies, including terrain data, should be evaluated, and the most accurate data shall be used. FEMA shall provide USACE with updated levee data for incorporation into the NLD as appropriate.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
612	Effective immediately	Key Decision	Flood Risk Projects must follow the Key Decision Points (KDPs) process and each KDP must be documented. A Flood Risk Project shall not advance in its project lifecycle beyond a KDP without Regional and HQ approval. The six distinct KDPs: • KDP 0: decision to initiate a Flood Risk Project or group of Flood Risk Projects. • KDP 1: decision to move forward with a Flood Risk Project through data development, risk awareness, and/or outreach tasks • KDP 2: decision to develop Preliminary FIRM products • KDP 3: decision to distribute Preliminary FIRM products to communities • KDP 4: decision to initiate the Appeal Period • KDP 5: decision to issue the LFD	Flood Risk Projects must follow the Key Decision Point (KDP) process and each KDP must be documented. A Flood Risk Project shall not advance in its project lifecycle beyond a KDP without regional and headquarters approval. The six distinct KDPs: • KDP 0: decision to initiate a Flood Risk Project or group of Flood Risk Projects • KDP 1: decision to move forward with a Flood Risk Project through data development, risk awareness, and/or outreach tasks • KDP 2: decision to develop Preliminary FIRM products • KDP 3: decision to distribute Preliminary FIRM products to communities • KDP 4: decision to initiate the Appeal Period • KDP 5: decision to issue the LFD
613	Effective immediately	Coastal – General	FEMA does not issue CLOMA or LOMA determinations in V zones where the primary frontal dunes (PFDs) define the inland limits of V zones.	FEMA does not issue MT-1s in V zones where the primary frontal dunes (PFDs) define the inland limits of V zones.
614	Effective immediately	Coastal – General	FEMA will only use BFEs in the format of the effective flood hazard map for CLOMA or CLOMR-F determinations where effective flood hazard areas are the result of coastal flood hazard analysis.	For MT-1 requests where effective flood hazard areas are the result of coastal flood hazard analysis, FEMA will only use BFEs in the format of the effective flood hazard map.

SID	Implementation Description	Primary Keyword	Original Standard	Revised Standard
619	Effective immediately	Coastal – Mapping	When revising the dune feature identified as the Primary Frontal Dune in an effective FIS, the revised feature must be as continuous as, or more continuous than, the effective PFD and provide an accurate representation of the regional dune feature .This is especially important in areas with multiple ridges throughout a dune field, areas with man-made dunes, and property-specific revisions, including requests that the PFD designation be removed altogether. Community coordination may be required to make this assessment.	As defined in 44 C.F.R. § 59.1 and clarified in SID 91, the Primary Frontal Dune (PFD) is defined by the geometry of the regional feature and is independent of surge and wave driven coastal hazards. The PFD therefore may not be superseded by updated analyses of these hazards. When revising PFD, revisions must provide an accurate representation of the regional, geomorphological dune and must be as continuous as, or more continuous than, the effective PFD. This is especially important in areas with multiple ridges throughout a dune field, areas with man-made dunes, and property-specific revisions, including requests that the PFD designation be removed altogether. Community coordination may be required to make this assessment.
624	Effective immediately	Letter of Map Amendment (LOMA)	The Special Flood Hazard Area (SFHA) designation shall not be conditionally or effectively removed from a structure or property by letter when the lowest adjacent grade to the structure or lowest point on the property is or would be below the applicable 1-percent-annual-chance flood elevation, unless certified data can be presented to demonstrate that naturally occurring intervening high ground exists between the structure or property and the source of flooding.	The SFHA designation shall not be conditionally or effectively removed from a structure or property by letter when the lowest adjacent grade to the structure or lowest point on the property is or would be below the applicable 1-percent-annual-chance flood elevation, unless certified topographic data can be presented to demonstrate that naturally occurring intervening high ground exists between the structure or property and the source of flooding.
649	Effective immediately	Letter of Map Amendment (LOMA)	New standard.	FEMA does not issue MT-1s within communities or areas where flood hazards are designated "For Informational Purposes Only" on the FIRM.

SID 113 Table Comparison

Original Table:

Risk Class	Characteristics	Delineation Reliability of the floodplain boundary per study methodology [1]	
		Zone A	All Other Zones
A	High population and densities within the floodplain and/or high anticipated growth	+/- 1/2 contour 95%	+/- 1.0 foot / 95%
B	Medium populate and densities within the floodplain and/or modest anticipated growth	+/- 1/2 contour 90%	+/- 1.0 foot / 90%
C	Low population and densities within the floodplain and/or modest anticipated growth	+/- 1/2 contour 85%	+/- 1.0 foot / 85%
D	Undetermined Risk, likely subject to flooding	N/A	N/A
E	Minimal risk of flooding; area not studied	N/A	N/A

[1] The difference between the ground elevation (defined from topographic data) and the computed flood elevation

Revised Table:

Risk Class	Characteristics	Delineation Reliability of the floodplain boundary per study methodology [1]	
		Zone A (Non-Model-Backed)	All Other Zones (Enhanced Methods)
A	High population and densities within the floodplain and/or high anticipated growth	+/- 1/2 contour 95%	+/- 1.0 foot / 95%
B	Medium populate and densities within the floodplain and/or modest anticipated growth	+/- 1/2 contour 90%	+/- 1.0 foot / 90%
C	Low population and densities within the floodplain and/or modest anticipated growth	+/- 1/2 contour 85%	+/- 1.0 foot / 85%
D	Undetermined Risk, likely subject to flooding	N/A	N/A
E	Minimal risk of flooding; area not studied	N/A	N/A

[1] The difference between the ground elevation (defined from topographic data) and the computed flood elevation

SID 417 Table Comparison

Original Table:

Flood Risk Product/Dataset		New Flood Hazard Analysis[1] Conducted	No New Flood Hazard Analysis[1] Conducted
Flood Risk Database		Required[2]	Required[2]
Flood Risk Dataset	Changes Since Last FIRM	Automated[3]	N/A
	Water Surface Elevation Grids	Required[4]	Optional[5]
	Flood Depth Grids	Required[4]	Optional[5]
	Percent Annual Chance & Percent 30-year Chance Grids	Required[6]	Optional[5]
	Flood Risk Assessment	Required[7,9]	Required[8,9]
	Areas of Mitigation Interest (AOMI)	Required	Required
Flood Risk Map		Optional	Optional
Flood Risk Report		Optional	Optional

[1] New Flood Hazard Analysis = flooding sources receiving regulatory-level analyses

[2] Shapefiles and GeoTIFFS are required for the submission. The FRD data in geodatabase format is optional and only required if specifically contracted.

[3] CSLF is optional in areas where digital modernized floodplain boundaries are not available for the effective, and its creation would be performed by the mapping partner, not automated tool.

[4] Riverine studies: 10%, 4%, 2%, 1%, 1%+, and 0.2% annual-chance floods

[5] Can be produced for flooding sources not receiving new analyses if based on effective data

[6] Riverine Only

[7] Riverine studies: 10%, 4%, 2%, 1%, 1%+, and 0.2% annual-chance floods, and Annualized
Coastal studies: only the 1% annual-chance flood
Levee studies: Riverward/Seaward side - same as Riverine or Coastal
Landward side - only based on the landward depth grid

[8] Assessments are performed for the flood events with available depth grids. See Flood Risk Database Technical Reference for more information.

[9] Analysis can be conducted at census block or user-defined facility level.

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Flood Risk Product/Dataset		New Flood Hazard Analysis[1] Conducted	No New Flood Hazard Analysis[1] Conducted
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Responses to Public Comments Received in August 2024

Several comments were received during the comment period. The comments and FEMA's response are listed by their SIDs below:

SID 133

- **Public Comment:** SID 133 (revised): "Floodplain boundaries of the 1-percent-annual-chance flood must be delineated on the FIRM. If it is calculated, the 0.2-percent-annual-chance flood must be delineated on the FIRM for enhanced (i.e. Zone AE) flood studies."
  [...] comments:
  - This implies that even if calculated, the 0.2% would not have to be mapped for Zone A studies. Given Federal Flood Risk Management Standard (FFRMS) needs, this seems like a step backwards.
  - Past FEMA lingo uses "enhanced" for some Zone A studies, is "enhanced" a true definition?
  - What does it mean for the effective Zone A areas that are being restudied? Omission of 0.2% would be a sort of "downgrade" in such cases, and contrary to what FEMA is aiming to achieve through FFRD with graduated risk profiles.
- **Response:** Agreed. Last part of sentence "for enhanced (i.e. Zone AE) flood studies" removed from the language update. Further clarification to be developed in a future guidance update.

SID 133

- **Public Comment:** To whom it may concern;

  The [...] asked that I pass along a comment on the current 2024 Maintenance Cycle of proposed changes to the Standards and Guidelines.

  The revision to SID 133, where floodplain boundaries of the 1-percent (100-yr) and 0.2-percent-annual-chance (500-yr) floods must be delineated. We have taken this to mean that the 500-yr must be mapped in Zone A reaches, if it is calculated and we have been doing so on Risk MAP projects. We believe this was brought up in the Applied Approaches/Lessons Learned section of FEMA's KSS database.

  The revised SID 133 specifically calls out "enhanced (i.e. Zone AE) flood studies". Does that mean mapping the 500-yr flood hazard boundary is no longer required for Zone A areas?

  Proposed SID 133 language:
  Floodplain boundaries of the 1-percent-annual-chance flood must be delineated on the FIRM. If it is calculated, the 0.2-percent-annual-chance flood must be delineated on the FIRM for enhanced (i.e. Zone AE) flood studies.
- **Response:** Agreed. Last part of sentence "for enhanced (i.e. Zone AE) flood studies" removed from the language update. Further clarification to be developed in a future guidance update.

SID 134

- **Public Comment:** See no difference between the original and revised standard. It isn't listed in the summary table.

- **Response:** The current standard mis-spells "redelineation" as "re-delineation", but the mis-spelling was mistakenly corrected in the announcement in the editorial review before publication.

SID 198

- **Public Comment:** SID 198 (revised): “When LOMCs are processed, current, past, and future map actions are considered.”
  [...] comments:
  - "Considered" is a very general term and doesn't specify how current or past map actions are considered. Neither the MT-1 nor MT-2 guidance documents seem to unpack this standard either so it seems vague how a mapping partner can meet this standard. Also, how are future map actions supposed to be considered when processing a current LOMC? Should this be clarified to state that either Preliminary or Pending map actions will be considered?
- **Response:** Agreed. Standard language retained as-is and will not be updated.

SID 198

- **Public Comment:** Does not seem clearer than the original. maybe more ambiguous at least for me
  - Agree that proposed edit is less clear to me than the original.
- **Response:** Agreed. Standard language retained as-is and will not be updated.

SID 215

- **Public Comment:** SID 215 (revised): “Conditional LOMCs are subject to the same standards of a LOMA, LOMR-F, or LOMR except:
  - Because Conditional LOMCs are based on proposed construction, as-built information is not required; however, proposed certified elevation data is required.
  - The Conditional Comment Documents that are issued by FEMA do not amend or revise the effective FHBM or FIRM.
  - Conditional LOMRs and CLOMR-Fs must provide documentation to FEMA to demonstrate compliance with the Endangered Species Act.”
- [...] comment: Please define "proposed certified elevation data"
- **Response:** Revised to “proposed certified elevation information” to align with terminology in MT- 1 guidance. Additional details can be found in the guidance documents.

SID 215

- **Public Comment:** “however, proposed certified elevation data is required”
  Question: Is this covered by our requirement to certify proposed design plans and topographic workmaps?
- **Response:** Yes; All elevation data has to be certified inclusive of the two datasets mentioned in the comment. The term proposed certified elevation information includes all information as prescribed in the guidance. Please reference guidance for more information.

SIDs 218, 404, 407

- **Public Comment:** Not in the summary list.

- **Response:** These SIDs were listed together as Item 8.

SID 316

- **Public Comment:** SID 316 (revised): “Hydraulic structures other than levees must be labeled on the FIRM panel and match what is shown on the flood profile. The 1 percent annual-chance- flood discharge, 0.2 percent -annual-chance- flood discharge, and/or floodway are contained in the structure note shall only be labeled on the flood profile.”
- […] comments:
    - 1) The wording of the second sentence doesn't quite flow; it's missing quotation marks for the text of the containment notes. Perhaps it could be reworded as "If 1-percent-annual-chance flood discharge, 0.2-percent-annual-chance flood discharge, and/or floodway are contained in the structure, the applicable note shall only be labeled on the flood profile." Please also note that the hyphens in “1 percent annual-chance- flood discharge” and “0.2 percent -annual-chance- flood discharge” in the revised Standard are not consistent with how those terms are hyphenated in other Standards.
    - 2) The current version of the standard specifies that the containment note should only refer to the highest contained discharge. Is that still the case?
    - 3) Will culverts be symbolized and labeled as "Culvert" on FIRM panels? Currently AMP does not consistently symbolize and label culverts. Culverts that contain the 1% or 0.2% discharge are labeled with the containment note by AMP, but AMP does not symbolize them with the dashed black line. Culverts with no containment note are symbolized by AMP with the dashed black line, but are not labeled by AMP.
- **Response:** Comments 1 and 2 were incorporated. Comment 3 will require an AMP update. This will be submitted to the CDS as a change request (CR) for future AMP updates.

SID 316

- **Public Comment:** “note shall only be labeled on the flood profile.”
  I don't see the benefit for this update. Structure capacity on the flood profiles is usually self-explanatory but it is ambiguous on FIRM especially due to the scale.
- **Response:** Removing the contained in notes from the FIRM panel will simplify the maps, making them more legible. The information is stored within the FIRM Database S_GEN_STRUCT feature class and will now be included also on the Flood Profiles for non-GIS users.

SID 406

- **Public Comment:** The LOMC-VALID letter shall be mailed to the community CEO and floodplain administrator and the Distribute Revalidation MIP Task submitted no less than five business days prior to the effective date of the revised FIRM(s).
    - delete "submitted"
- **Response:** Submitting the MIP task is a key step in ensuring the revalidation letters are posted to the MSC when the letters go into effect. For that reason the word “submitted” can not be removed from the SID. The language has been modified as follows to provide clarity. *The LOMC-VALID letter shall be mailed to the community CEO and floodplain administrator, and the Distribute Revalidation MIP Task shall be submitted no less than five business days prior to the effective date of the revised FIRM(s).*

SID 408

- **Public Comment:** Requests for Letters of Determination Reviews (LODRs) can be submitted to FEMA by a lender and/or borrower within 45 days of notification that the structure is located in a Special Flood Hazard Area (SFHA) by the lender. The LODR request needs to be signed by both lender and borrower.
    - Add “and/or borrower” to be consistent with previous sentence.
- **Response:** Language updated from “and/or” to “or” since either the lender or borrower may submit the request. The second instance of “and” retained since both lender and borrower must sign the request.